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DEPARTMENT OF HEALTH & HUMAN SERVICES
Food and Drug Administration
New England District

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July 5, 2000

WARNING LETTER

NWE-33-00W

VIA FEDERAL EXPRESS

Stanley G. Elfbaum, Ph.D., President
Clinical Science Laboratories, Inc.
51 Francis Avenue
Mansfield, MA 02048

Dear Dr. Elfbaum:

During an inspection of your drug testing laboratory located in Mansfield, MA conducted on May 3, 4 & 8, 2000, Investigator Richard Penta documented deviations from the current Good Manufacturing Practice Regulations (Title 21, Code of Federal Regulations, Parts 210 & 211). These deviations cause your drug product(s) to be adulterated within the meaning of Section 501(a)(2)(B) of the Federal Food, Drug and Cosmetic Act (the Act).

1. Failure to determine conformance to written specifications. [21 CFR 211.160(2)] For example,

   - According to the [redacted] Worksheet for [redacted], [redacted] a citrate value of 108 mg/ml was reported. The in-process worksheet from which this value was transposed reported a final result for citrate of 1.18 g/l, which was out of the established [redacted] specification for citrate. Furthermore, the transposed value of 108 mg/ml for citrate was used to calculate a sodium citrate dihydrate value of 1.68 mg/ml that was found to be within the established specification of [redacted] However, if the correct citrate value of 1.18 g/l had been used to calculate sodium citrate dihydrate, this would have resulted in a sodium citrate dihydrate value of 1.84 mg/ml. This value would have been outside of the established specification of [redacted] for sodium citrate dihydrate.

- Raw data potassium results for [redacted] from the [redacted] are different from the [redacted] Worksheet entries for CSL #s:

  [redacted]

  According to the [redacted] Worksheets, the established specification for potassium is [redacted] Therefore, the correct transposition of the afore-mentioned raw data to the [redacted] Worksheets would have resulted in out of specification analytical results.

2. Failure to retain all production, control, or laboratory records to assure that drug products adhere to established specifications. [21 CFR 211.180 and 211.194] For example,

   - Raw data printouts from the [redacted] for the calcium, chloride, potassium and sodium tests associated with CSL #s 110998 [redacted] 111030 [redacted], and 111891 [redacted] of the [redacted] were not available.

   - Raw data printouts from the [redacted] for the calcium test associated with CSL #s 111362 [redacted], 111214 [redacted] and 111069 [redacted] of [redacted] were not available.

   - Raw data printouts from the [redacted] for the sodium and glucose tests associated with CSL #s 110003 [redacted] 110004 [redacted] and 110005 [redacted] of [redacted] were not available.

3. Failure to effectively train employees in laboratory operations to assure that original records are accurate, complete and in compliance with established specifications. [21 CFR 211.25 and 21 CFR 211.194(8)]

The above identification of violations is not intended to be an all-inclusive list of deficiencies at your facility. It is your responsibility to assure adherence with each requirement of the Good Manufacturing Practice Regulations. Federal agencies are

advised of the issuance of Warning Letters about drugs so that they may take this information into account when considering the award of contracts. Additionally, drug product approvals associated with your testing laboratory may not be approved until the above violations are corrected.

You should take prompt action to correct these deviations. Failure to promptly correct these deviations may result in regulatory action without further notice. Possible actions include seizure and/or injunction.

We have received your response to the FDA Form 483 that was issued to you on May 8, 2000. However, the submission of that response does not preclude you from specifically responding to the items noted in this letter. You should notify this office in writing, within 15 working days of receipt of this letter, of the specific steps you have taken to correct the noted violations, including an explanation of each step being taken to prevent the recurrence of similar violations. If corrective action cannot be completed within 15 working days, state the reason for the delay and the time within which the corrections will be completed. The adequacy of the corrections you undertake will be confirmed during a follow-up inspection of your facility.

Your reply should be directed to Alyson L. Saben, Compliance Officer, at the above noted address.

Sincerely yours,

Gail T. Costello
District Director
New England District Office

[redacted]